

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

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) **Civil Action No. 03 MDL 1570 (GBD)(FM)**
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)
)

This document relates to: All Actions

AFFIDAVIT OF MOHAMMAD ANWAR AL SHUKAIRY

I, Mohammad Anwar Al Shukairy, state under penalty of perjury as follows:

1. I am a citizen of Canada and Jordan and currently reside in Jeddah, Saudi Arabia. I have been employed at Saudi Binladin Group ("SBG") since 1996, holding the position of assistant to Senior Vice President, Hasan Binladin. I have personal knowledge of the matters stated in this affidavit.

2. The Iridium Middle East Corporation ("IME" or "IMEC") is a company incorporated and registered in the British Virgin Islands. IMEC was jointly owned by the Mawarid Group ("Mawarid"), holder of Class M shares, and Trinford Investments S.A. ("Trinford"), a British Virgin Islands company, holder of Class B shares. In or about 1993, IMEC entered into an agreement to invest in Iridium, Inc., a global wireless telecommunications company based in Washington, D.C. In 1996, Iridium, Inc. was converted into a Delaware limited liability company, Iridium, LLC. IMEC owned less than 5% of the shares of Iridium, LLC.

3. Attached as Exhibit A is a true and correct copy (SBG0002891-2921) of the Written Resolutions of the Sole Member of [IMEC] Pursuant to Regulation 72 of the Articles of



Association of the Company, dated July 21, 1993, attaching IMEC's Amended and Restated Memorandum of Association and Amended and Restated Articles of Association.

4. Attached as Exhibit B is a true and correct copy (SBG0002873-2890) of the Shareholders' Agreement Relating to Trinford Investments S.A. dated April 17, 1994, in connection with Trinford's investment in IMEC. SBG was a beneficial owner of one shareholder, Elm Park Investments Ltd., a Cayman Islands company. The names of the other four shareholders, in none of which SBG had a direct or indirect interest, are redacted. One of the five proposed shareholders indicated in the document did not execute the agreement, but the other four shareholders continued to operate under the agreement without further amendment.

5. Attached as Exhibit C is a true and correct copy (SBG0002922-2926) of a Promissory Note for Class B Shares of IMEC signed by Trinford, which is dated July 29, 1993.

6. Attached as Exhibit D is a true and correct copy (SBG0002927) of a letter dated April 11, 1996, from the Chairman of IMEC, who was also the Chief Executive Officer of Mawarid Holding Company, appointing Hasan Binladin as IMEC's representative to the board of Iridium, Inc., which included approximately two dozen other directors at the time and continued to do so after the company converted to Iridium, LLC. Iridium held board meetings all over the world, of which Hasan Binladin attended no more than five in the United States during his three years on its board.

7. IMEC's principal offices were in Dubai and Saudi Arabia. From approximately 1996 to 1998, IMEC maintained a small, temporary liaison office in Washington, D.C. to coordinate with Iridium, LLC personnel in Washington, D.C. on issues relating to the development of IMEC's Middle East gateway. IMEC was not registered or licensed to do

business in Washington, D.C. or anywhere else in the United States, and it did not carry on any business activities in the United States. No SBG employees worked in the office.

8. On August 13, 1999, Iridium, LLC filed a voluntary petition in bankruptcy; involuntary petitions were filed against it on the same day. Thereafter, IMEC ceased to engage in business activities beyond those related to the winding up of its gateway operations in the Middle East and resolution of issues arising out of Iridium's bankruptcy.

Kingdom of Saudi Arabia
Western Province
City of Jeddah
Consulate General of the
United States of America



Mohammad Anwar Al Shukairy

Sworn to me this 31st day of Oct., 2009

Carolin K. El Khatib
Notary Public Consul of the
United States of America

My Commission Expires Indefinitely